

## **REMARKS**

In response to the Office Action dated May 31, 2007, Applicants respectfully request reconsideration.

### **Claim objections**

Claims 51 and 54 stand objected to because there is no support or mention of variables A-C in prior claims. Claims 51 and 54 have been amended. Applicants respectfully assert that claims 51 and 54 are patentable.

Applicants have also amended claim 48, and respectfully assert that claim 48 is patentable.

### **35 U.S.C. § 103 rejections**

Claims 1-32 and 34-70 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,952,698 (Delaire) in view of U.S. Patent No. 6,401,097 (McCotter).

Applicants respectfully assert that the Examiner has not established a *prima facie* case of obviousness under M.P.E.P. § 2143, which requires that “the prior art reference (or references when combined) must teach or suggest all the claim limitations.” (Emphasis added). Applicants respectfully assert that the Examiner has not shown how Delaire or McCotter teach or suggest certain limitations of the claims. For example, there is no reference to how Delaire or McCotter teaches a volume manager that is configured to keep a record of changes that includes information indicative of i) what changes are made to the selected file, ii) who makes the changes to the selected file, and iii) when the changes were made to the selected file.

Notwithstanding Applicants’ assertion that a *prima facie* case of obviousness has not been established, Delaire in view of McCotter does not teach, disclose, suggest, or make obvious a computerized file management system as recited in claim 1.

The Examiner cites various portions of Delaire as teaching the volume manager recited in claim 1. While Delaire uses the phrase “volume manager,” the volume manager discussed in Delaire is different from the volume manager recited in claim 1.

Delaire discusses a system that manages a storage area network having hosts that are coupled with storage devices via an interconnect fabric. Col. 21, ll. 33. The management of the storage area network is limited to the structure of the overall storage area network and not individual files contained therein. *See e.g. id.* at Figures 1-2, col. 21, ll. 29-44, col. 22, ll. 48-63. For example, Delaire collects information allowing it to discern the makeup, topology, and status of the storage area network and its components in order to implement policies such as assignment of a storage device to a host (i.e. not management of individual files). *Id.*, col. 22, ll. 48-56. Furthermore, while the Examiner cites to col. 54, l. 43 of Delaire as teaching “configured to manage electronic files” the cited portion refers to “file systems,” not individual files. In contrast to Delaire, claim 1 recites a volume manager configured to manage electronic files and to manage metadata relating to the electronic files.

Regarding McCotter, the Examiner cites col. 4, ll. 30-47 of McCotter as teaching a version of the file. The cited portion of McCotter discusses a dynamic content folder that the user can add for a full text or metadata search of the objects in the system. *Id.* at col. 4, ll. 32-35. When a user views the content of a dynamic content folder, only the documents that meet the search criteria as of the time the dynamic content folder is accessed are displayed. *Id.* at ll. 37-39 and 48-49. Searching a document as of the time it is accessed is not a “version” as is described in the specification of the present application. *See e.g.* ¶¶ 33, 57-58, and 179 of the present specification. Furthermore, claim 1 does not merely recite “a version” rather it recites “track ... a version” which is not discussed as a function of the dynamic content folders discussed in McCotter.

The Examiner also cited col. 3, ll. 8-22 and 50-65 of McCotter as teaching record changes that relate to changes caused by a user to at least one of the content of the selected file and the metadata related to the selected file. The cited portions of McCotter discuss viewing, modifying, or adding metadata. *Id.* at 58-59. Nowhere in the cited portions of McCotter (nor any other portions of McCotter) is it discussed that the system records the changes made when a user views, modifies, or adds metadata. In contrast, claim 1 recites “keep a record of changes ... wherein the record of changes relates to changes caused by the user to at least one of the content of the selected file and the metadata related to the selected file.”

Thus, for at least the above reasons, claim 1 is patentable over the combination of Delaire and McCotter.

Claims 2-32 and 34-70, which depend from independent claim 1, are patentable for at least the same reasons discussed above with respect to independent claim 1.

### **Conclusion**

Based on the foregoing, this application is believed to be in allowable condition, and a notice to that effect is respectfully requested. If a telephone conversation with Applicant's representative would help expedite the prosecution of this application, the Examiner is invited to call the undersigned attorney at (617) 542-6000.

The Director is hereby authorized to charge any fees which may be required, or credit any overpayment, to Deposit Account 50-0311, Reference No. 25396-003. The Director is further authorized to charge any required fee(s) under 37 C.F.R. §§ 1.19, 1.20, and 1.21 to the abovementioned Deposit Account.

Respectfully submitted,

/Kyle Turley/

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A. Jason Mirabito, Reg. No. 28,161  
Kyle Turley, Reg. No. 57,197  
Attorneys for Applicants  
MINTZ, LEVIN, COHN, FERRIS,  
GLOVSKY AND POPEO, PC  
One Financial Center  
Boston, MA 02111  
Tel.: (617) 542-6000  
Fax: (617) 542-2241  
Customer No. 30623

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